Tennessee Department of Environment and Conservation
Division of Water Resources
William R. Snodgrass Tennessee Tower,
312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243
1-888-891-8332 (TDEC)

Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

1. MS4 Information

Name of MS4: City of Goodlettsville		MS4 Permit Number: TNS075345
Contact Person: Warren Garrett		Email Address: wgarrett@goodlettsville.gov
Telephone: (615) 851-3462		MS4 Program Web Address: www.goodlettsville.gov
Mailing Address: 105 S. Main Street		
City: Goodlettsville	State: Tennessee	ZIP code: 37072

What is the current population of your MS4? 16,950

What is the reporting period for this annual report? July1 2019 to June 30 2020

2. Discharges to Waterbodies with Unavailable Parameters or Exceptional Tennessee Waters (Section 3.1)

A. Does your MS4 discharge into waters with unavailable parameters (previously referred to as impaired) for pathogens, nutrients, siltation or other parameters related to stormwater runoff from urbanized areas as listed on TN's most current 303(d) list and/or according to the on-line state GIS mapping tool (tdeconline.tn.gov/dwr/)? If yes, attach a list. ☒ Yes ☐ No

B. Are there established and approved TMDLs (http://www.tn.gov/environment/article/wr-ws-tennessees-total-maximum-daily-load-tmdl-program) with waste load allocations for MS4 discharges in your jurisdiction? If yes, attach a list. ☒ Yes ☐ No

C. Does your MS4 discharge to any Exceptional Tennessee Waters (ETWs - http://environment-online.tn.gov:8080/pls/enf_reports/f?p=9034:34304:4880790061142)? If yes, attach a list. ☐ Yes ☒ No

D. Are you implementing specific Best Management Practices (BMPs) to control pollutant discharges to waterbodies with unavailable parameters or ETWs? If yes, describe the specific practices: 18-304. Land disturbance permit. (1) General. The land disturbance permit is to be obtained by the owner(s) or owner(s) designee(s) for development or redevelopment of over an acre, or less than an acre if required by the administrator. The land disturbance permit is designed to track all applicable land disturbance activities and ensure they are monitored for compliant erosion prevention and sediment controls, the absence of illicit discharges leaving the site, and compliance with the city's TDEC NPDES MS4 general permit along with any applicable TDEC construction general permits, TDEC Aquatic Resources Alteration Permits (ARAP), and any other relevant permits. Tracking of these activities allows inspection, and in cases of non-compliance, enforcement actions to be taken. (2) Exemptions. The following land disturbance activities are exempt from the requirements of obtaining a land disturbance permit: (a) Surface mining as is defined in Tennessee Code Annotated, § 59-8-202. (b) Such minor land disturbing activities as home gardens and individual home landscaping, home repairs, home additional or modifications, home maintenance work, and other related activities that result in no soil erosion leaving the site. (Erosion Prevention and Sediment Control (ESPC) practices may be enforced through individual building permits.) (c) Agriculture practices involving the establishment, cultivation or harvesting of products in the field or orchard, preparing and planting of pastureland, farm ponds, dairy operations, livestock and poultry management practices, and the construction of farm buildings. (d) Any project carried out under the technical supervision of NCRS, TDOT, TDEC, or USACE that is covered under applicable state or federal construction permits. (e) Installation, maintenance, and repair of any underground public utility lines when such activity occurs on an existing road, street, or sidewalk which is hard surfaced and such street, curb, gutter, or sidewalk construction has been approved. (f) Any emergency activity that is immediately necessary for the protection of life, property, or natural resources. These activities may be undertaken without a land disturbance permit; however, the person conducting these excluded activities shall remain responsible for conducting these activities within accordance with provisions of this ordinance and other applicable regulations including responsibility for controlling sediment, illicit discharges, and runoff.

☒ Yes ☐ No

3. Public Education/Outreach and Involvement/Participation (Sections 4.2.1 and 4.2.2)

A. Have you developed a Public Information and Education plan (PIE)?

☒ Yes ☐ No

B. Is your public education program targeting specific pollutants and sources, such as Hot Spots? If yes, describe the specific pollutants and/or sources targeted by your public education program: Our target audiences have been addressed in a broad sense on our website which allows us to provide information to virtually all of our citizens. Although we provide this information, we know only a certain number of population will read it or research certain concerns. We are now providing information via mail directly to residents for good housekeeping via a flyer "Stormwater Quarterly". We also provide verbal education to landscapers regarding grass clipping removal or mulching. We provide the previous on an quarterly basis.Hotspots are tracked by the Inspector through quarterly reports received from targeted businesses. we also installed an Oil Recycling facility at public works to help inform the public of proper recycling and avoidance of illegal oil disposal.

☒ Yes ☐ No

C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: http://www.goodlettsville.gov/194/Stormwater-Management ☒ Yes ☐ No

D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: Website, Facebook, Email, Utility billing flyers, Tailgate Wrap.

E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period:

1. Mid Tennessee Stormwater Group
2. Stormwater Quarterly Educational Literature mailed.
3. TNSA Rban Runoff 5K (Cancelled due to COVID-19)
4. TNSA President 2020
5. Stormwater Tailgate wrap for education and hotline #
6. Online Water Education Video.
7. Facebook Social Media program
8. Community Advisory Panel
9. Community Stream Cleanup Event.
10. 250K Tree Day
11. Adopt-A-Street Program
12. Creek Critters program through CRC

F. Summarize any specific successful outcome(s) (e.g., citizen involvement, pollutant reduction, water quality improvement, etc.) fully or partially attributable to your public education and participation program during this reporting period:

1. Community Advisory Panel. Provide resource materials to Community Group to network stormwater related information and business on a monthly basis. Creation and implementation of the Stormwater Quarterly.
2. Stream Cleanup. volunteers including advisors, employees, citizens, scouts and church members collecively helped remove approximately 6,000 lbs. of trash and vegetation from our local streams and tributaries.
3. 250K Tree Day (TEC). To provide a distribution point for local residents to pick up trees from TEC program
4. Adopt a Street Program. We provide a permanent sign for the program at each end of adopted area. We also have business sign a 2 year contract to remove litter from area at least quarterly and provide the city with a total of bags removed from litter collection. 10 sites currently adopted.
5. Capital Improvement Signs. We provide a temporary sign at each CIP site during the design and construction phase to notify passerby of project coming to educate on use of Stormwater Utility Fees.
6. Social Media Advertisements (TNSA). To provide social media of water quality to various audiences thru Facebook Stormwater posts.
7. Stormwater Educational Media on Website.This video is an attempt to reach the entire population and beyond. We intend to procede with 7 more videos covering the six minimum measures as well as infrastructure maintenance and repair, Fall 2020
8. Creek Critters Program (CRC). Through CRC (Cumberland River Compact) facilitators, provide Water Education for fourth grade students Cancelled due to COVID
9. Urban Runoff 5K (TNSA). Water quality and sustainability forum combined with a fundraiser 5k through TNSA. Opportunity to provide educational supplies to community at display booth
10. Mid Tennessee Stormwater Group. Provide resource materials to help each other by networking stormwater related information and business on a monthly basis. Goal of 24 hours per year.

4. Illicit Discharge Detection and Elimination (Section 4.2.3)

A. Have you developed and do you continue to update a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into waters of the state or conveyances owned or operated by another MS4? ☒ Yes ☐ No

B. If yes, does the map include inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewershed of that outfall, and general direction of stormwater flow? ☒Yes ☐ No

C. How many outfalls have you identified in your storm sewer system? 131 Outfalls from previous data. We are current with a new GIS system Web Based.

D. Do you have an ordinance, or other regulatory mechanism, that prohibits non-stormwater discharges into your storm sewer system? ☒Yes ☐ No

E. Have you implemented a plan to detect, identify and eliminate non-stormwater discharges, including illegal disposal, throughout the storm sewer system? If yes, provide a summary: 18-309. Illicit discharges.

(1) Scope. This section shall apply to all water generated on developed or undeveloped land entering the city's separate storm sewer system.

(2) Prohibition of illicit discharges. No person shall introduce or cause to be introduced into the municipal separate storm sewer system any discharge that is not composed entirely of stormwater or any discharge that flows from stormwater facility that is not inspected in accordance with § 16-506 shall be an illicit discharge. Non-stormwater discharges shall include, but shall not be limited to, sanitary wastewater, commercial car wash wastewater, lawn mowing debris, lawn care chemicals, grease, soap, cleaning chemicals, radiator flushing disposal, spills from vehicle accidents, carpet cleaning wastewater, effluent from septic tanks, improper oil disposal, laundry wastewater/gray water, improper disposal of auto and household toxics. The commencement, conduct or continuance of any non-stormwater discharge to the municipal separate storm sewer system is prohibited except as described as follows:

(a) Uncontaminated discharges from the following sources:

(i) Water line flushing or other potable water sources;

(ii) Landscape irrigation or lawn watering with potable water;

(iii) Diverted stream flows;

(iv) Rising ground water;

(v) Groundwater infiltration to storm drains;

(vi) Pumped groundwater; (vii) Foundation or footing drains;

☒ Yes ☐ No

(viii) Crawl space pumps;

(ix) Air conditioning condensation;

(x) Springs; (xi) Non-commercial washing of vehicles;

(xii) Natural riparian habitat or wetland flows;

(xiii) Swimming pools (if dechlorinated - typically less than one (1) PPM chlorine);

(xiv) Firefighting activities;

(xv) Any other uncontaminated water source.

(b) Discharges specified in writing by the city as being necessary to protect public health and safety.

(c) Dye testing is an allowable discharge if the city has so specified in writing.

(d) Discharges authorized by the Construction General Permit (CGP), which comply with section 3.5.9 of the same:

(i) Dewatering of work areas of collected stormwater and ground water (filtering or chemical treatment may be necessary prior to discharge);

(ii) Waters used to wash vehicles (of dust and soil, not process materials such as oils, asphalt or concrete) where detergents are not used and detention and/or filtering is provided before the water leaves site; (iii) Water used to control dust in accordance with CGP section 3.5.5;

(iv) Potable water sources including waterline flushings from which chlorine has been removed to the maximum extent practicable;

(v) Routine external building washdown that does not use detergents or other chemicals;

(vi) Uncontaminated groundwater or spring water; and

(vii) Foundation or footing drains where flows are not contaminated with pollutants (process materials such as solvents, heavy metals, etc.).

(3) Prohibition of illicit connections. The construction, use, maintenance or continued existence of illicit connections to the municipal separate storm sewer system is prohibited. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.

(4) Reduction of stormwater pollutants by the use of best management practices. Any person responsible for a property or premises, which is, or may

be, the source of an illicit discharge, may be required to implement, at the person's expense, the BMPs necessary to prevent the further discharge of pollutants to the municipal separate storm sewer system. Compliance with all terms and conditions of a valid NPDES permit authorizing the discharge of stormwater associated with industrial activity, to the extent practicable, shall be deemed in compliance with the provisions of this section. Discharges from existing BMPs that have not been maintained and/or inspected in accordance with this ordinance shall be regarded as illicit.

(5) Notification of spills. Notwithstanding other requirements of law, as soon as any person responsible for a facility or operation, or responsible for emergency response for a facility or operation has information of any known or suspected release of materials which are resulting in, or may result in, illicit discharges or pollutants discharging into, the municipal separate storm sewer system, the person shall take all necessary steps to ensure the discovery, containment, and cleanup of such release. In the event of such a release of hazardous materials the person shall immediately notify emergency response agencies of the occurrence via emergency dispatch services. In the event of a release of non-hazardous materials, the person shall notify the city in person or by telephone, fax, or email, no later than the next business day. Notifications in person or by telephone shall be confirmed by written notice addressed and mailed to the city within three (3) business days of the telephone notice. If the discharge of prohibited materials emanates from a commercial or industrial establishment, the owner or operator of such establishment shall also retain an on-site written record of the discharge and the actions taken to prevent its recurrence. Such records shall be retained for at least three (3) years.

(6) No illegal dumping allowed. No person shall dump or otherwise deposit outside an authorized landfill, convenience center or other authorized garbage or trash collection point, any trash or garbage of any kind or description on any private or public property, occupied or unoccupied, inside the city.

(7) Hot spots. The administrator is authorized to regulate hot spots. Upon written notification by the administrator, the property owner or designated facility manager of a hot spot area shall, at their expense, implement necessary controls and/or best management practices to prevent discharge of contaminated stormwater to the municipal separate storm sewer system. The administrator may require the facility to maintain inspection logs or other records to document compliance with this paragraph. (Ord. #04-651, Jan. 2005, as replaced by Ord. #15-830, Feb. 2015)

F. How many illicit discharge related complaints were received this reporting period? 3

G. How many illicit discharge investigations were performed this reporting period? 3

H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 3

5. Construction Site Stormwater Runoff Pollutant Control (Section 4.2.4)

A. Do you have an ordinance or other regulatory mechanism requiring:

Construction site operators to implement appropriate erosion prevention and sediment control BMPs consistent with those described in the TDEC EPSC Handbook?	☒ Yes	☐ No
Construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste?	☒ Yes	☐ No
Design storm and special conditions for unavailable parameters waters or Exceptional Tennessee Waters consistent with those of the current Tennessee Construction General Permit (TNR100000)?	☒ Yes	☐ No

B. Do you have specific procedures for construction site plan (including erosion prevention and sediment BMPs) review and approval? ☒ Yes ☐ No

C. Do you have sanctions to enforce compliance? ☒ Yes ☐ No

D. Do you hold pre-construction meetings with operators of priority construction activities and inspect priority construction sites at least monthly? ☒ Yes ☐ No

E. How many construction sites disturbing at least one acre or greater were active in your jurisdiction this reporting period? 10

F. How many active priority and non-priority construction sites were inspected this reporting period? 8, We treat all active construction sites as priority with twice monthly inspections.

G. How many construction related complaints were received this reporting period? Copper Creek II phase V/ Copper Creek I Phase II/ Parkview Preserve Phase I

6. Permanent Stormwater Management at New Development and Redevelopment Projects (Section 4.2.5)

A. Do you have a regulatory mechanism (e.g. ordinance) requiring permanent stormwater pollutant removal for development and redevelopment projects? If no, have you submitted an Implementation Plan to the Division? ☒ Yes ☐ No / ☐ Yes ☐ No

B. Do you have an ordinance or other regulatory mechanism requiring:

Site plan review and approval of new and re-development projects?	☒ Yes	☐ No
A process to ensure stormwater control measures (SCMs) are properly installed and maintained?	☒ Yes	☐ No

Permanent water quality riparian buffers? If yes, specify requirements: 18-306. Buffer zones. The goal of the water quality buffer is to preserve undisturbed vegetation that is native to the streamside habitat in the area of the project. Vegetated, preferably native, water quality buffers protect water bodies by providing structural integrity and canopy cover, as well as stormwater infiltration, filtration and evapotranspiration. Buffer width depends on the size of a drainage area. Streams or other waters with drainage areas less than one (1) square mile will require buffer widths of thirty feet (30') minimum. Streams or other waters with drainage areas greater than one (1) square mile will require buffer widths of sixty feet (60') minimum. The sixty feet (60') criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than thirty feet (30') at any measured location. The MS4 must develop and apply criteria for determining the circumstances under which these averages will be available. A determination that standards cannot be met may not be based solely on the difficulty or cost associated with implementation. Every attempt should be made for development and redevelopment activities not to take place within the buffer zone. If water quality buffer widths as defined above cannot be fully accomplished on-site, the MS4 must develop and apply criteria for determining the circumstances under which alternative buffer widths will be available. A determination that water quality buffer widths cannot be met on site may not be based solely on the difficulty or cost of implementing measures, but must include multiple criteria, such as: type of project, existing land use and physical conditions that preclude use of these practices.

Buffer zone requirements:

(1) "Construction" applies to all streams adjacent to construction sites, with an exception for streams designated as impaired or Exceptional Tennessee waters, as designated by the Tennessee Department of Environment and Conservation. A thirty foot (30') foot natural riparian buffer zone adjacent to all streams at the construction site shall be preserved, to the maximum extent practicable, during construction activities at the site. The water quality buffer zone is required to protect waters of the state located within or immediately adjacent to the boundaries of the project, as identified using methodology from standard operating procedures for hydrologic determinations (see rules to implement a certification program for qualified hydrologic professionals, Tennessee Rules chapter 0400-40-17). Buffer zones are not primary sediment control measures and should not be relied on as such. Rehabilitation and enhancement of a natural buffer zone is allowed, if necessary, for improvement of its effectiveness of protection of the waters of the state. The buffer zone requirement only applies to new construction sites. The riparian buffer zone should be preserved between the top of stream bank and the disturbed construction area. The thirty (30) feet criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than fifteen feet (15') at any measured location.

☒ Yes ☐ No

Buffer zone requirements for discharges into impaired or high quality waters: A sixty foot (60') natural riparian buffer zone adjacent to the receiving stream designated as impaired or high quality waters shall be preserved, to the maximum extent practicable, during construction activities at the site. The water quality buffer zone is required to protect waters of the state (e.g., perennial and intermittent streams, rivers, lakes, wetlands) located within or immediately adjacent to the boundaries of the project, as identified on a 7.5-minute USGS quadrangle map, or as determined by the director. Buffer zones are not sediment control measures and should not be relied upon as primary sediment control measures. Rehabilitation and enhancement of a natural buffer zone is allowed, if necessary, for improvement of its effectiveness of protection of the

waters of the state. The buffer zone requirement only applies to new construction sites. The riparian buffer zone should be established between the top of stream bank and the disturbed construction area. The sixty feet (60') criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than twenty-five (25') at any measured location.

(2) "Permanent" new development and significant redevelopment sites are required to preserve water quality buffers along waters within the MS4. Buffers shall be clearly marked on site development plans, grading permit applications, and/or concept plans. Buffer width depends on the size of a drainage area. Streams or other waters with drainage areas less than one (1) square mile will require buffer widths of thirty feet (30') minimum. Streams or other waters with drainage areas greater than 1 square mile will require buffer widths of sixty feet (60') minimum. The sixty feet (60') criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than thirty feet (30')at any measured location. (Ord. #04-651, Jan. 2005, as replaced by Ord. #15-830, Feb. 2015)

C. What is the threshold for development and redevelopment project plans plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? 18-305. Stormwater system design: construction and permanent stormwater management performance standards. (1) Applicability. This section shall be applicable to all land development, including, but not limited to, site plan applications, subdivision applications, land disturbance applications and grading applications. The requirements in this section shall apply to any new development or redevelopment site that meets one or more of the following criteria:

(a) One (1) acre or more;

(i) New development that involves land disturbance activities of one (1) acre or more;

(ii) Redevelopment that involves other land disturbance activity of one (1) acre or more;

(b) Developments and redevelopments less than one acre of total land disturbance may also be required to obtain authorization under this ordinance if:

(i) The administrator has determined that the stormwater discharge from a site is causing, contributing to, or is likely to contribute to a violation of a state water quality standard;

(ii) The administrator has determined that the stormwater discharge is, or is likely to be a significant contributor of pollutants to waters of the state; or

(iii) Any new development or redevelopment, regardless of size, that is defined by the administrator to be a hotspot land use.

(c) Other options:

i) Change in elevation of property.

(ii) Any land disturbance that requires coverage under a TDEC construction general permit. (iii) Any disturbance that requires coverage under a TDEC ARAP.

(2) General requirements. Stormwater at applicable developments and redevelopments shall be managed in accordance with the requirements contained within this section.

(a) Any discharge of stormwater or other fluid to an improved sinkhole or other injection well, as defined, must be authorized by permit or rule as a Class V underground injection well under the provisions of Tennessee Department of Environment and Conservation (TDEC) Rules, chapter 1200-4-6.

(b) Stormwater design or BMP manuals.

(i) Adoption. The city adopts as its MS4 stormwater design and Best Management Practices (BMP) manuals for stormwater management, construction and permanent, the following publications, which are incorporated by reference in this ordinance as if fully set out herein:

(A) TDEC Erosion Prevention and Sediment Control Handbook; most current edition.

(B) Tennessee Permanent Stormwater Management and Design Guidance Manual; most current edition. (C) Metro Nashville Stormwater Management Manual Volume 5, Low Impact Development

(D) And/or a collection of city approved BMPs.

(ii) The publications listed above include a list of acceptable BMPs including the specific design performance criteria and operation and maintenance requirements. These include city approved BMPs for permanent stormwater management including green infrastructure BMPs.

(iii) Stormwater facilities that are designed, constructed and maintained in accordance with these publications will be presumed to meet the minimum water quality performance standards.

(c) Submittal of a copy of the NOC, SWPPP and NOT to the local MS4

(i) Permittees who discharge stormwater through an NPDES-permitted Municipal Separate Storm Sewer System (MS4) who are not exempted in section 1.4.5 (permit coverage through qualifying local program) of TDEC's Construction General Permit (CGP) must provide proof of coverage under the Construction General Permit (CGP); submit a copy of the Stormwater Pollution Prevention Plan (SWPPP); and at project completion, a copy of the signed Notice of Termination (NOT) to the administrator. Permitting status of all permittees covered (or

previously covered) under this general permit as well as the most current list of all MS4 permits is available at the TDEC's data viewer web site.

(ii) Copies of additional applicable local, state or federal permits (i.e.: ARAP, etc.) must also be provided upon request.

(iii) If requested by the city, these permits must be provided before the issuance of any land disturbance permit or the equivalent.

D. How many development and redevelopment project plans were reviewed for this reporting period? 4

E. How many development and redevelopment project plans were approved? 4

F. How many permanent stormwater related complaints were received this reporting period? 0

G. How many enforcement actions were taken to address improper installation or maintenance? 18

H. Do you have a system to inventory and track the status of all public and private SCMs installed on development and redevelopment projects? ☒ Yes ☐ No

I. Does your program include an off-site stormwater mitigation or payment into public stormwater fund? If yes, specify. N/A ☐ Yes ☒ No

7. Stormwater Management for Municipal Operations (Section 4.2.6)

A. As applicable, have stormwater related operation and maintenance plans that include information related to maintenance activities, schedules and the proper disposal of waste from structural and non-structural stormwater controls been developed and implemented at the following municipal operations:

Streets, roads, highways?	☒ Yes	☐ No
Municipal parking lots?	☒ Yes	☐ No
Maintenance and storage yards?	☒ Yes	☐ No
Fleet or maintenance shops with outdoor storage areas?	☒ Yes	☐ No
Salt and storage locations?	☒ Yes	☐ No
Snow disposal areas?	☐ Yes	☒ No
Waste disposal, storage, and transfer stations?	☒ Yes	☐ No

B. Do you have a training program for employees responsible for municipal operations at facilities within the jurisdiction that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s? ☒ Yes ☐ No

If yes, are new applicable employees trained within six months, and existing applicable employees trained and/or retrained within the permit term? ☒ Yes ☐ No

8. Reviewing and Updating Stormwater Management Programs (Section 4.4)

A. Describe any revisions to your program implemented during this reporting period including but not limited to:

Modifications or replacement of an ineffective activity/control measure. Provided CRC a contract to address school education for fourth graders, we no longer provide the WET program due to ineffectivness in our jurisdiction.

Changes to the program as required by the division to satisfy permit requirements. Updated and revised several ordinace provisions per audit of TDEC MCM4

Information (e.g. additional acreage, outfalls, BMPs) on newly annexed areas and any resulting updates to your program. infrastrucure and outfalls with GIS

B. In preparation for this annual report, have you performed an overall assessment of your stormwater management program effectiveness? If yes, summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period.

SUMMARY - STORMWATER PROGRAM - CITY OF GOODLETTSVILLE

GOODLETTSVILLE ANNUAL PROGRAM REVIEW of MCM's

BMP (Event) & Responsible Party/ Summary of Results/ Effective (1=0%, 5=100%)

PUBLIC EDUCATION & OUTREACH -- Estimated Population: 16,000

Mid-Tennessee Stormwater Group 3.5

Cumberland River Compact Waterfest 1

Stormwater Newslwtter Quarterly Education 5

TNSA Urban 5K Runoff 1

Creek Critters (CRC) Program 5

Walk Across Sumner 1

Western Kentucky University Stormwater Education. 5

Tailgate Advertisement Wrap 5

Social Media 5

Business Outreach 5

☒ Yes ☐ No

PUBLIC EDUCATION & OUTREACH SCORE : 75% 41.5 Points of 55

PUBLIC PARTICIPATION

Community Advisory Panel 4

Stream Cleanups 2.5

250k Tree Day 5

Adopt a Street 4

Citizens Leadershipp Academy 5

PUBLIC PARTICIPATION: 82% 20.5 Points of 25

CONSTRUCTION SITE RUNOFF CONTROL

Ordinance or other Regulatory Mechanism 5

Construction Sites :

Residential/Commercial 5

Pre-Con 5

Enforcement Procedures NOV's 5

CONSTRUCTION SITE RUNOFF CONTROL: 100% 20 Points of 20

POST-CONSTRUCTION STORMWATER MANAGEMENT

Inspection & Maintenance Agreements 5

Post Inspection Received 5

Emnforcement Procedure letters

Civil Penalty 5

POST-CONSTRUCTION STORMWATER MANAGEMENT: 100% 20 Points of 20

ILLICIT DISCHARGE DETECTION & ELIMINATION

IDDE Reports/ Letters 5

HOT SPOTS 3

ILLICIT DISCHARGE DETECTION & ELIMINATION: 80 %. Points 8 of 10

TOTAL PROGRAM EFFECTIVENESS

Employee Training/ Conferences 5

SOP - Facility Inspections 1

SOP - Standard Operating Procedures 5

SWMP - Storm Water Management Plan 5

PIE - Public Information Education 5

ERP - Enforcement Response Plan 5

GOOD HOUSKEEPING 87 %, Points = 26 of 30

TOTAL PROGRAM EFFECTIVENESS: Socre 136 of 160 possible points - 85%

9. Enforcement Response Plan (Section 4.5)

A. Have you implemented an enforcement response plan that includes progressive enforcement actions to address non-compliance, and allows the maximum penalties specified in TCA 68-221-1106? If no, explain. N/A ☒ Yes ☐ No

B. As applicable, identify which of the following types of enforcement actions (or their equivalent) were used during this reporting period; indicate the number of actions, the minimum measure (e.g., construction, illicit discharge, permanent stormwater management), and note those for which you do not have authority:

Action	Construction	Permanent Stormwater	Illicit Discharge	In Your ERP?	
Verbal warnings	#0	#0	#0	☒ Yes	☐ No
Written notices	#18	#0	#3	☒ Yes	☐ No
Citations with administrative penalties	#2	#13	#0	☒ Yes	☐ No
Stop work orders	#4	#0	#0	☒ Yes	☐ No
Withholding of plan approvals or other authorizations	#0	#0	#0	☒ Yes	☐ No
Additional Measures	#0	#0	#0	Describe: N/A	

C. Do you track instances of non-compliance and related enforcement documentation? ☒ Yes ☐ No

D. What were the most common types of non-compliance instances documented during this reporting period? Erosion and Sediment release construction sites, lack of Post Construction reports

10. Monitoring, Recordkeeping and reporting (Section 5)

A. Summarize any analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. None

B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. None

C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report. ☐ Yes ☒ No

11. Certification

This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in sub-part 6.7.2 of the permit.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Tim Ellis (City Manager)
Printed Name and Title

Signature

7-14-2020
Date

Annual reports must be submitted by September 30 of each calendar year (Section 5.4) to the appropriate Environmental Field Office (EFO), identified in the table below:

EFO	Street Address	City	Zip Code	Telephone
Chattanooga	1301 Riverfront Pkwy, Suite 206	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 520-6688
Jackson	1625 Hollywood Drive	Jackson	38305	(731) 512-1300
Johnson City	2305 Silverdale Road	Johnson City	37601	(423) 854-5400
Knoxville	3711 Middlebrook Pike	Knoxville	37921	(865) 594-6035
Memphis	8383 Wolf Lake Drive	Bartlett	38133	(901) 371-3000
Nashville	711 R S Gass Boulevard	Nashville	37216	(615) 687-7000

Final Version 2014 303(d) LIST (Cheatham Reservoir Watershed cont.)

Waterbody ID	Impacted Waterbody	County	Miles/Acres Impaired	CAUSE / TMDL Priority		Pollutant Source	COMMENTS
TN05130202 023 – 2000	BROWN'S CREEK	Davidson	4.1	Nitrate+Nitrite Total Phosphorus Other Anthropogenic Habitat Alterations Escherichia coli Oil and Grease	M M L NA L	Minor Industrial Point Source Discharges from MS4 area Urbanized High Density Area	Water contact advisory. Category 5. EPA approved a pathogen TMDL that addresses some of the known pollutants.
TN05130202 027 – 1000	DRY CREEK	Davidson	0.5	Escherichia coli	NA	Collection System Failure	Water contact advisory. Category 4a, pathogen TMDL addresses the known pollutant.
TN05130202 027 – 2000	DRY CREEK	Davidson	5.9	Other Anthropogenic Habitat Alterations	L	Urbanized High Density Area	Stream is Category 5. (One or more uses impaired.)
TN05130202 202 – 1000	PAGES BRANCH	Davidson	5.11	Escherichia coli	NA	Discharges from MS4 area	Category 4a. EPA approved a pathogen TMDL that addresses the known pollutant.
TN05130202 209 – 1000	COOPER CREEK	Davidson	3.9	Other Anthropogenic Habitat Alterations Escherichia coli	L NA	Discharges from MS4 area	Category 5. Approved pathogen TMDL addresses some of the known pollutants.
TN05130202 211 – 1000	LOVES BRANCH	Davidson	1.71	Other Anthropogenic Habitat Alterations	L	Discharges from MS4 area	Stream is Category 5. (One or more uses impaired.)
TN05130202 212 – 0100	NEELEYS BRANCH	Davidson	1.7	Escherichia coli	NA	Discharges from MS4 area	Category 4a. Approved pathogen TMDL addresses the known pollutants.
TN05130202 212 – 1000	GIBSON CREEK	Davidson	3.7	Habitat loss due to stream flow alteration Other Anthropogenic Habitat Alterations	NA L	Discharges from MS4 area Hydromodification	Category 5. Flow alteration is 4c (impact not caused by a pollutant).
TN05130202 220 – 0100	LUMSLEY FORK	Davidson	4.7	Escherichia coli	NA	Discharges from MS4 area	Category 4a. EPA approved a pathogen TMDL that addresses the known pollutant.
TN05130202 220 – 0200	WALKERS CREEK	Davidson	6.49	Escherichia coli	NA	Undetermined Source	Category 4a. Approved pathogen TMDL addresses the known pollutant.
TN05130202 220 – 0210	UNNAMED TRIB TO WALKERS CREEK	Davidson	1.47	Flow Alteration	NA	Upstream Impoundment	Randomly selected for Impounded Streams Study. Category 4C. Impairment not caused by a pollutant.
TN05130202 220 – 0300	SLATERS CREEK	Sumner	0.99	Loss of biological integrity due to siltation Escherichia coli	L NA	Sand/Gravel/Rock Quarry Discharges from MS4 area Bank Modification	Category 5. Approved pathogen TMDL addresses some of the known pollutants.
TN05130202 220 – 0350	SLATERS CREEK	Sumner	10.24	Escherichia coli	NA	Discharges from MS4 area	Category 4a, pathogen TMDL addresses the known pollutant.

Final Version 2014 303(d) LIST (Cheatham Reservoir Watershed cont.)

Waterbody ID	Impacted Waterbody	County	Miles/Acres Impaired	CAUSE / TMDL Priority	Pollutant Source	COMMENTS
TN05130202 220 – 0400	MADISON CREEK	Sumner	14.4	Loss of biological integrity due to siltation L	Land Development	Stream is Category 5. (One or more uses impaired.)
TN05130202 220 – 0500	CENTER POINT BRANCH	Sumner	3.8	Organic Enrichment L	Discharges from MS4 area	Stream is Category 5. (One or more uses impaired.)
TN05130202 220 – 1000	MANSKERS CREEK	Davidson Sumner	7.9	Loss of biological integrity due to siltation L Escherichia coli NA	Discharges from MS4 area	Water contact advisory. Category 5. EPA approved a pathogen TMDL that addresses some of the known pollutants.
TN05130202 220 – 2000	MANSKERS CREEK	Davidson Sumner	7.6	Loss of biological integrity due to siltation L Low Dissolved Oxygen L Escherichia coli NA	Discharges from MS4 area	Category 5. EPA approved a pathogen TMDL that addresses some of the known pollutants.
TN05130202 314 – 0300	BOSLEY SPRINGS BRANCH	Davidson	1.5	Nitrate+Nitrite M Total Phosphorus M Other Anthropogenic Habitat Alterations L Escherichia coli NA	Discharges from MS4 area	Category 5. EPA approved a pathogen TMDL that addresses some of the known pollutants.
TN05130202 314 – 0400	SUGARTREE CREEK	Davidson	4.3	Nitrate+Nitrite M Total Phosphorus M Low Dissolved Oxygen Other Anthropogenic Habitat Alterations L Escherichia coli NA	Discharges from MS4 area Urbanized High Density Area	Category 5. EPA approved a pathogen TMDL that addresses some of the known pollutants.
TN05130202 314 – 0700	VAUGHNS GAP BRANCH	Davidson	0.6	Other Anthropogenic Habitat Alterations L Escherichia coli NA	Collection System Failure Urbanized High Density Area Discharges from MS4 area	Category 5. Approved pathogen TMDL addresses some of the known pollutants.
TN05130202 314 – 0750	VAUGHNS GAP BRANCH	Davidson	1.9	Other Anthropogenic Habitat Alterations L Escherichia coli NA	Discharges from MS4 area Urbanized High Density Area	Category 5. Approved pathogen TMDL addresses some of the known pollutants.
TN05130202 314 – 0800	JOCELYN HOLLOW BRANCH	Davidson	2.0	Nitrate+Nitrite M Total Phosphorus M Escherichia coli NA	Discharges from MS4 area	Category 4a. Approved pathogen TMDL addresses the known pollutants.
TN05130202 314 – 1000	RICHLAND CREEK	Davidson	1.9	Total Phosphorus M Nitrate+Nitrite M Other Anthropogenic Habitat Alterations L Escherichia coli NA	Collection System Failure Urbanized High Density Area Discharges from MS4 area	Advisory due to Metro collection system overflows. Category 5. Approved pathogen TMDL addresses some of the known pollutants.

2. (B) Are there established and approved TMDLs with waste load allocations for MS4 discharges in your jurisdiction? If yes, attach a list.

Waterbody I.D. #	Cause/TMDL Priority	Approved TMDL
TN05130202027-2000 Dry Creek	Habitat alterations	No
TN05130202220-0100 Lumsley Fork	E. coli	Yes
TN05130202220-0400 Madison Creek	Siltation	No
TN05130202220-1000 Mansker Creek	Siltation	No
TN05130202220-2000 Mansker Creek	Siltation	No
TN05130202220-1000 Mansker Creek	E. coli	Yes
TN05130202220-2000 Mansker Creek	E. coli	Yes
TN05130202220-0300 Slater's Creek	E. coli	Yes
TN05130202220-0300 Slater's Creek	Siltation	No

GOODLETTSVILLE ANNUAL PROGRAM REVIEW of MCM's

COLUMN A- D	COLUMN E-H	COLUMN I-L	COLUMN M-P	COL Q-R	COLUMN S-V	COL W
BMP (Event) & Responsible Party	**Measurable Goal**	**Theme or Message**	**Target Audience or (50% of area population = 8,000)**	**% of Target Audience Reached & Total # of People reached**	**Summary of Results**	**Effective (1=0%) (5=100%)**
PUBLIC EDUCATION & OUTREACH -- Estimated Population: 16,000						
Mid-Tennessee Stormwater Group Belle Meade, Goodlettsville, Gallatin, Greenbrier, Hendersonville, Lebanon, Millersville, Mt. Juliet, White House, Sumner County, Local Vendors and Public	Provide resource materials to help each other by networking stormwater related information and business on a monthly basis. Goal of 24 hours per year.	By Networking we can improve permit requirements and protect regional water quality.	9 cities/1 county	70% (3 months cancelled due to COVID-19)	Goal is to network with local MS4's at least 2 hrs. per month. The second Wednesday from 10 am to 12 pm. We cover legislative issues as well as ongoing issues regarding construction inspections and enforcement.	3.5
Cumberland River Compact Waterfest Goodlettsville, Gallatin, Hendersonville, Sumner County, UT Extension,	Public Education and Outeach for local children about water quality and stormwater.	Booth with water quality handouts regarding what children can do at home to help protect our local streams.	200 Children ages 5 through 16	Cancelled due to COVID-19	Booth handouts totaled close to $1200 in reminders of water quality. Items included frisbees, sponge footballs, first aid kits, literature, re-usable plastic tumblers.	1
Stormwater Newslwtter Quarterly Education Goodlettsville	Provide homeowners with a Newsletter of Stormwater information on a Quarterly basis; to be included in the residential Utility Billing.	Quarterly Newsletter topics wiil change, CAP board will develop quarterly topic andmaterial to be included.	16,000/6,000 homes	100%/16,000	Results will depend on long term education and compliance.	5
TNSA Urban 5K Runoff Goodlettsville	Water quality and sustainability forum combined with a fundraiser 5k through TNSA. Opportunity to provide educational supplies to community at display booths.	Booth with water quality handouts regarding what children can do at home to help protect our local streams. An update to this offer will inclued an Enviroscape presentation presented by Sumner County	Families ages 5 to 65	Cancelled due to COVID-19	Sponsorship of $1000.00 for TNSA provision of Water Quality information to the community, personal participation.	1

Creek Critters (CRC) Program Madison Creek Elementary Scool, Goodlettsville	Through CRC (Cumberland River Compact) facilitators, provide Water Education for fourth grade students.	Fourth Grade Environmental Eduction Water Education for Teachers	Fourth grade students at Madison Creek Elementary School as well as 3 other elementary schools within Sumner and Davidson Counties.	100%	All 4th grade student provided wth hands on education	5
Walk Across Sumner Goodlettsville	Provide water quality educational literature to local community in Sumner County through sponsorship of program. Provided 1300 handouts	Walk Across Sumner 2019	2000 residents in Sumner County/3500 participants	Cancelled due to COVID-19	Sponsored event with Platinum level, this allowed the City of Goodlettsville to insert 2000 packets with water quality literature to be handed out at opening event to 1300 participants. City logo displayed on website for one year and recognized as a sponsor for water quality	1
Western Kentucky University Stormwater Education Goodlettsville	WKU to provide 7 educational Videos for the website. All videos will represent the 6 MCM's and 1 will represent drainage infrastructure repair.	Provide community with accessible information for the city of Goodlettsville Stormwater program	100%/16,000	100%/8	These videos are an attempt to reach the entire population and beyond.	5
Tailgate Advertisement Wrap Goodlettsville	To provide daily advertisement of hotline number for illicit discharge or water pollution to the citizens of Goodlettsville on tailgate of truck.	Watershed Protection through Stormwater Management	100%/16,000	100%/16,000	Provide daily advertisement of hotline number for illicit discharge or water pollution to the citizens of Goodlettsville on tailgate of truck.	5
Social Media Goodlettsville	To provide social media of water quality to various audiences thru Facebook Stormwater posts.	Water Quality, Informational & Educational issues	100%	over 100,000	Videos are designed to provide Stormwwater information to audiences that currently have no streams to environmental issues.	5
Business Outreach Goodlettsville	To provide Stormwater Education to our local business through Facebook ads. Goal is to reach any business that make provide services to the Goodlettsville area.	Water Quality, Informational & Educational issues	100%	over 100,000	Facebook ads are targeting Business and individuals that do not have any links to environmental issues.	5
CIP Signage Goodlettsville	To provide signage at CIP sites to inform residents, or any passerby of CIP project completed with the use of Stormwater funds. Signage to be installed at Design Phase to show project is coming.	Useage of Stormwater fees and notification of CIP Projects	Residents and all Passerby	16,000+	We provide a permanent sign at each CIP site during the design phase to notify passerby of project is coming and it represents use of Stormwater Utility Fees.	5
			SCORE 41.5	of 55	75%	41.5

PUBLIC PARTICIPATION

BMP (Event) & Responsible Party	Measurable Goal	Theme or Message	Target Audience	Estimate of People Participated	Summary of Results	Effective (1=0%) (5=100%)
Community Advisory Panel Goodlettsville	Provide resource materials to Community Group to network stormwater related information and business on a monthly basis. Goal of 24 hours per year.	By working together as a community we can improve permit requirements and protect regional water quality.	6 members	6 (2 months cancelled due to COVID-19)	Goal is to meet with CAP group at least 2 hrs. per month. The third Thursday from 9 am to 11 am. We cover legislative issues as well as ongoing issues regarding construction inspections and enforcement. Develop public awarness through newsletter articles.	4
Stream Cleanups Goodlettsville, Millersville	Solicit at least 50 local volunteers to provide litter and vegetation removal from local creeks. Twice annually.	Community/Stream Cleanup Event	Local volunteers, church groups, scouts and business leaders	70 (1 event cancelled due to COVID-19)	68 volunteers including advisors, employees, citizens, scouts and church members collecively helped remove approximately 8,000 lbs. of trash and vegetation from our local streams and tributaries.	2.5
250k Tree Day Goodlettsville, White House	To provide a distribution point for local residents to pick up trees from TEC program, this event is hosted by the Community Advisory Panel Members on behalf of Goodlettsville.	Tennessee Environmental Council 250k Tree Day	57 participants	57	Approximatley 409 seedlings distributed	5
Adopt a Street Goodlettsville	To provide litter removal from city streets through business volunteers.	Adopt a Street Program	Citizens and Businesses	30	We provide a permanent sign for the program at each end of adopted area. We also have business sign a 2 year contract to remove litter from area at least quarterly and provide the city with a total of bags removed from litter collection. 13 sites currently adopted.	4
Citizens Leadershipp Academy Goodlettsville	To provide overall Stormwater Education Program to the Leadership Academy	6 MCM's	Citizens Academy	12	Provided Power Point presentastion to inform of our program as well as drainage infrastrucrure repairs and CIP's.	5
			SCORE	20.5 of 25	82%	20.5

CONSTRUCTION SITE RUNOFF CONTROL

BMP (Event) & Responsible Party	Measurable Goal	Completed (Yes or No)	City Ordinance Used or Website	Summary of Results	Effective (1=0%) (5=100%)
Ordinance or other Regulatory Mechanism Goodlettsville Stormwater Department	Stormwater Ordinance	Yes	www.goodlettsville .gov/publicworks/stormwater	Existing Ordinance is effective, however, will be revised as necessary.	5
Construction Sites : Residential/Commercial Goodlettsville Stormwater Department	To Provide a list of Commercial and Residential permits issued this Fiscal Year	Yes	Permits can be viewed on the city website under Codes Archives; , OR in the City Managers Monthly Report	Existing list is accurate and is vital in showing growth of the city as well as tracking all water quality concerns due to construction and land disturbance.	5
Pre-Con Goodlettsville Stormwater Department	Pre-cons are required to inform the developer and contractor what is expected from the Stormwater department. These precons include other departments as well. Implement distribution of checklist in precon stage	Yes	contractors, designers, 100% included with land distrubance permit	Precons are very effective but improvements are constantly needed. New spreadsheet was added for tracking and comlaince Goal is Reduction in number if NV, (Discussion of possible fee reduction incentive program to reduce fees, if reports are electronically submitted on time) Will also consider two different pre-cons, one for developemnet and the other prior to vertical construction for contractors.	5
Enforcement Procedures NOV's Goodlettsville Stormwater Department	Our measurable goal would be to reduce NOV's on an annual basis. Education improvement or mandatory video at precon may become norm.	Yes	Developers	Reduction in number of NOV's would be our goal next year. (14 Nov's FY 2018/19) (14 NOV's FY 2019/20) No change.	5

SCORE	20	of	20	100%	20	

POST-CONSTRUCTION STORMWATER MANAGEMENT

BMP (Event) & Responsible Party	Measurable Goal	Completed (Yes or No)	City Ordinance Used or Website	Summary of Results	Effective (1=0%) (5=100%)
Inspection & Maintenance Agreements Goodlettsville Stormwater Department	Per Ordinance our Inspection and Maintenance Agreements must be received by JULY 1 of each year for compliance	YES	www.goodlettsville .gov/publicworks/stormwater	We have sent letters out to 30 IMA businesses of which 28 has been compliant so far. Next year compliance will be encouraged with a civil penalty.	5
Post Inspection Received Goodlettsville Stormwater Department	To receive 100% of required inspections	Yes	www.goodlettsville .gov/publicworks/stormwater	55% COMPLIANT	5
Emnforcement Procedure letters Civil Penalty Property Owner/Certified EPSC	Maintain program effecitveness	Yes	www.goodlettsville .gov/publicworks/stormwater	We are currently working to improve this documentation and compliance from owners.	5
Post Construction SCM Inspections Property Owner/PE	Annual Inspection via Stormwater Coordinator/Inspector	Yes	www.goodlettsville .gov/publicworks/stormwater GIS for SCM's now located on GIS Public Viewer	Have identified current lack of inspections and or maintenance to provide information back to owners for compliance measures.	5
		SCORE	20	of 20	100%	20

ILLICIT DISCHARGE DETECTION & ELIMINATION

BMP (Event) & Responsible Party	Measurable Goal	Completed (Yes or No)	City Ordinance Used or Website	Summary of Results	Effective (1=0%) (5=100%)
IDDE Reports/ Letters Goodlettsville Stormwater Department	IDDE through visual stream assesments and inquiries from residents.	Yes	www.goodlettsville .gov/publicworks/stormwater	We perform stream assessments once every permit cycle with contract through WKU. We also perform them during our stream cleanups. Hotline allows for IDDE complaints.	5
HOT SPOTS Goodlettsville Stormwater Department	Log, assessment, and compliance plan of action of outstanding Hot Spots and status, until area cleared of issue This information is tracked and documented by the Stormwater Inspector per the SWMP.	Yes	www.goodlettsville .gov/publicworks/stormwater	The property owner or designated facility manager of a hot spot area shall, at their expense, implement necessary controls and/or best management practices to prevent discharge of contaminated stormwater to the municipal separate storm sewer system. Ord. #04-651, Jan. 2005, as replaced by Ord. #15-830, Feb. 2015) - At this time there is a backlog on records to update this score.	3

SCORE	8	of	10	80%	8

GOOD HOUSKEEPING

BMP (Event) & Responsible Party	Measurable Goal	Completed (Yes or No)	% of Employees Trained	Summary of Results	Effective (1=0%) (5=100%)
Employee Training/ Conferences Goodlettsville Stormwater Department	To provide once every permit cycle employee training regarding good housekeeping. New employees must be trained within 6 months of hire.	Yes	100%	We have partnered with MTAS to provide training to all local MS4's at the Gallatin Civic Center once every permit cycle. Next scheduled date will be in 2021..	5
SOP - Facility Inspections Goodlettsville Stormwater Department	The City Stormwater Inspector to perform Monthly facility inspections to ensure compliance per SOP. Inspections enforced and tracked through Stormwater Inspector.	Yes	N/A	Provide spreadsheet of inspections with dates and facility inspected to Auditor upon request. Prior inspections for fiscal year were not performed.	1
SOP - Standard Operating Procedures Goodlettsville Stormwater Department	Review and update at least every permit cycle, or when administration changes occur.	Yes	N/A	Reviewed in 2020	5
SWMP - Storm Water Management Plan Goodlettsville Stormwater Department	Review and update at least every permit cycle, or when administration changes occur.	Yes	N/A	Reviewed in 2020	5
PIE - Public Information Education Goodlettsville Stormwater Department	Review and update at least every permit cycle, or when administration changes occur.	Yes	N/A	Reviewed in 2020	5
ERP - Enforcement Response Plan Goodlettsville Stormwater Department	Review and update at least every permit cycle, or when administration changes occur.	Yes	N/A	Reviewed in 2020	5
			SCORE 26	of 30	87%	26

TOTAL PROGRAM EFFECTIVENESS

SCORE #####	of 160	85%	136